

Chris Chapman 212223  
RMSI 3A105  
7475 Coakell (3rd Blvd)  
Nashville, TN 37209

IN THE UNITED STATES DISTRICT COURT  
FOR THE Middle DISTRICT OF TENNESSEE  
(6th) Sixth DIVISION

**FILED**  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TENN.  
JAN - 3 2010  
HBB  
DEPUTY CLERK

Chris Chapman (PRE-TRIAL DETAINEE) Name )  
Prison Id. No. 26358 / 212223 )  
N/A Name )

(List the names of all the plaintiffs  
filing this lawsuit. Do not use "et  
al." Attach additional sheets if  
necessary.)

Prison Id. No. N/A  
Plaintiff(s)

**RECEIVED**

Civil Action No. 3 11 0006  
(To be assigned by the Clerk's  
office. Do not write in this space.)

JAN - 3 2011

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TENN.

Jury Trial ☒ Yes ☐ No

Royce Thacker; Sonya Trout;  
Timothy Erickson; Name )  
Sumner County Sheriff's Dept; Name )  
continued on page 4A )  
Defendant(s) )

(List the names of all defendants  
against whom you are filing this  
lawsuit. Do not use "et al." Attach  
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
FILED PURSUANT TO 42 U.S.C. § 1983

I. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuits in the United States District Court for the Middle District of Tennessee, or in any other federal or state court?

☒ Yes ☐ No

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs Chris Chapman  
Defendants Sonya Trout; Dee David Gay; C. Wayne Hyatt; Tana  
Wyllie; Sumner County Sheriff's Dept; County of Sumner

2. In what court did you file the previous lawsuit? Middle District, Sixth Circuit  
(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)
3. What was the case number of the previous lawsuit? 3:10-cv-01009
4. What was the Judge's name to whom the case was assigned? Todd J. Campbell
5. When did you file the previous lawsuit? 10-25-10 (Provide the year, if you do not know the exact date.)
6. What was the result of the previous lawsuit? For example, was the case dismissed, appealed, or still pending? Still pending
7. When was the previous lawsuit decided by the court? N/A (Provide the year, if you do not know the exact date.)
8. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit.
- ☐ Yes ☒ No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

II. THE PLAINTIFF'S CURRENT PLACE OF CONFINEMENT (The following information must be provided by each plaintiff.)

- A. What is the name and address of the prison or jail in which you are currently incarcerated? Riverside Maximum Security Institution 3A105  
7475 Cockrell Bend Blvd., Nashville TN 37209
- B. Are the facts of your lawsuit related to your present confinement?
- ☐ Yes ☒ No
- C. If you checked the box marked "No" in question II.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain.
- \_\_\_\_\_
- D. Do the facts of your lawsuit relate to your confinement in a Tennessee State Prison?
- ☐ Yes ☒ No

If you checked the box marked "No," proceed to question II.H.

E. If you checked the box marked "Yes" in question II.D above, have you presented these facts to the prison authorities through the state grievance procedure?

☐ Yes ☐ No

F. If you checked the box marked "Yes" in question II.E above:

1. What steps did you take? N/A

2. What was the response of prison authorities? N/A

G. If you checked the box marked "No" in question II.E above, explain why not. N/A

H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?

☒ Yes ☐ No

I. If you checked the box marked "Yes" in question II.H above, have you presented these facts to the authorities who operate the detention facility?

☒ Yes ☐ No

J. If you checked the box marked "Yes" in question II.I above:

1. What steps did you take? Filed grievances, requested investigations

2. What was the response of the authorities who run the detention facility? No responses, non-responses, retaliatory transfer

L. If you checked the box marked "No" in question II.I above, explain why not. N/A

**Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.**

### III. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Chris Chapman

Prison Id. No. of the first plaintiff: SCSP 26358 / TDOC 212223

Address of the first plaintiff: Riverside Maximum Security Institution  
3A105 7475 Cockrell Bend Blvd, Nashville TN 37209

(Include the name of the institution and mailing address, including zip code.  
If you change your address you must notify the Court immediately.)

2. Name of second the plaintiff: N/A

Prison Id. No. of the second plaintiff: N/A

Address of the second plaintiff: N/A

(Include the name of the institution and mailing address, including zip code.  
If you change your address you must notify the Court immediately.)

If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Royce Thacker %

Place of employment of the first defendant: Sumner County Sheriffs  
Dept.

The first defendant's address: 117 West Smith St.  
Gallatin, TN 37066

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

2. Name of the second defendant: Sonya Troutt %

Place of employment of the second defendant: Sumner County Sheriffs  
Dept.

The second defendant's address: 117 West Smith St.  
Gallatin, TN 37066

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, their place of employment, their address, and the capacity in which you are suing them. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide their proper name, place of employment, and address, the Clerk will be unable to serve them should process issue.

## -DEFENDANTS-

1. Royce Thacker %  
117 West Smith St.  
Gallatin, TN 37066
2. Sonya Troutt %  
117 West Smith St.  
Gallatin, TN 37066
3. Timothy Erickson %  
117 West Smith St.  
Gallatin, TN 37066
4. Sumner County Sheriffs Dept (SCSD)  
117 West Smith St.  
Gallatin, TN 37066
5. Southern Health Partners  
811 Broad St. 5<sup>th</sup> Floor  
Chattanooga, TN 37402
6. County of Sumner, TN  
355 North Belvedere Dr.  
Gallatin, TN 37066

P.4A

#### IV. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 in. x 11 in. paper. Write on one side only, and leave a 1 in. margin on all four sides.

1. On 11-10-10, Royce Thacker, a SCSD employee, did spray plaintiff in the crotch with a chemical weapon;
- SA SB - 2. On 2-13-10, plaintiff was denied medical attention by Southern Health Partners employee Nurse Jodi (last name unknown) and this was enforced by SCSD employees;
3. Since 3-26-10 till his retaliatory transfer, plaintiff had poor medical treatment in regards to his broken tooth;
4. On 3-20-10, plaintiff was denied adequate medical attention by Southern Health Partners employee Nurse Melanie (last name unknown);
5. On 4-8-10, plaintiff was physically assaulted and attacked with a chemical weapon while in the shower by Timothy Erickson, a SCSD employee;
6. On 4-28-10, plaintiff was denied medical attention by a SCSD employee;
- SA - 7. On or about 8-25-09, Southern Health Partners and SCSD did violate plaintiff's medical privacy;
- SA - 8. On or about 1-20-10, Southern Health Partners and SCSD did violate plaintiff's medical privacy;
9. On or about 1-20-10, Southern Health Partners did not adequately treat plaintiff's medical needs;
10. Since March of 2009, Southern Health Partners have not adequately treated plaintiff's medical needs;
11. On June 11<sup>th</sup> 2010, plaintiff was transferred in retaliation for among many questionable unconstitutional reasons, requesting access to a legal library;

Cont on p. 5A

#### V. RELIEF REQUESTED: Specify what relief you are requesting against each defendant.

- A. Declaration Order as described on p. 5B
- B. Injunctive Relief as described on p. 5B
- C. Compensatory Relief as described on p. 5B
- D. Punitive Relief as described on p. 5B
- E. Any Relief that the Court seem just and fit

F. I request a jury trial. ☒ Yes ☐ No

### Statement of Facts cont.

12. On 7-30-09 plaintiff was assaulted by numerous officers of the SCSD;
13. Plaintiff states that since 8-8-08, he has had to endure conditions of confinement that include, but not limited to denial of adequate medical treatment; adequate means to hygiene; denial of adequate law library access; has been victim to assault and battery; unnecessary rigor and various Constitutional Rights violations.

Plaintiff moves the Court to allow an Amend to this filing if need is found that any part may be deficient for any reason.

Plaintiff, Chris Chapman, is and was at all times since 8-8-08 and during events described herein a pre-trial detainee.

Plaintiff asserts that all federal and state constitutional rights violations claims for relief are genuine issues arguable in a court of law.

Plaintiff states that defendants acted under color of state law through direct and/or indirect action and/or liability and that all statements are true upon information and belief.



## -RELIEF-

1. Plaintiff requests an order declaring that the Defendants have acted in violation of the United States Constitution;
2. Plaintiff requests that all Incident; Informational; Disciplinary Reports involving plaintiff be expunged from Sumner County Sheriffs Dept. database, records and files as well as any copies that are in any other government branch or in a private collection anywhere in the world;
3. Plaintiff requests Federal criminal investigations into the Defendants named in regards to the assaults of 1-10-10 and 4-8-10 incidents named herein; also 7-30-10;
4. Plaintiff requests a thorough Federal Dept. of Justice investigation, including all relevant internal departments including but not limited to, the Bureau of Prisons, various Civil Rights Commissions, Criminal Investigation Divisions, Records Management, Justice Management, Health Inspector, Building Inspector as well as the Federal Health and Human Services Dept, the Internal Revenue Service and the Federal Bureau of Investigation into Sumner County, the SCSD, their employees and sub-contractors;
5. Compensatory Relief of no less than \$150,000 per violation not including any taxes, fines, fees, costs, etc.;
6. Punitive Relief of no less than \$150,000 per violation not including taxes, fines, fees, costs, etc.; and
7. Any Relief the Court seems just and fit.
8. Habeas Corpus Review/Relief

-Dollar amounts based on prior precedent cases

P. 5B



VI. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature:  Date: 12-1-10

Prison Id. No. 26358 1212223  
SSD TDC

Address: 7475 Cockrell Blvd. / 3A105  
Nashville, TN 37209

(Include the city, state and zip code.)

Signature: N/A Date: N/A

Prison Id. No. N/A

Address: N/A

(Include the city, state and zip code.)

**ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT**, and provide the information listed above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

**ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN FORMA PAUPERIS**, if not paying the civil filing fee.

**SUBMIT THE COMPLAINT, THE REQUIRED FILING FEE, OR APPLICATION TO PROCEED IN FORMA PAUPERIS, TOGETHER.** Complaints received without the required filing fee or application to proceed *in forma pauperis* will be returned. Filing fees, or applications to proceed *in forma pauperis*, received without a complaint will be returned.

SA

## INMATE REQUEST FORM

DATE SENT: 4-16-10

DATE RECEIVED: \_\_\_\_\_

ALL INMATE REQUEST FORMS SHALL BE SIGNED AND DATED.

PLACE AN X IN THE APPROPRIATE SPACE BELOW:

☒ MEDICAL OFFICER      ☐ INMATE VISITATION      ☐ JAIL ADMINISTRATOR      ☐ TRUSTEE  
☐ INMATE RECORDS      ☐ SHIFT COMMANDER      ☐ INMATE COMMISSARY      ☐ INDIGENT

INMATE NAME: Chris Chapman #26358 CELL NUMBER: 3C - 506

Are there any medical records/information release forms in any shape, form or fashion in my Southern Health Partners medical chart signed by me releasing info to anyone at all? Including but not limited to state, or local government agencies, their representatives, Sumner County Sheriff's Dept employees?

If there are no release forms, are you positive?

INMATE SIGNATURE [Signature]

RESPONSE: 4-18-10 - There are no medical release forms signed in your file. We do not release your records w/o a release from Corp.

Nurse Heather

RESPONDER SIGNATURE: \_\_\_\_\_

Christopher Chapman

Medical Records from 7-30 to present

Keith  
Beau

SL

Chapman was in medical and was standing in the corner  
he ~~made~~ said if we could hurry this train up we  
could get out of here. Nurse body asked ~~that~~ that he  
be taken back upstairs that she was not going to see  
him at this time

Kris ~~Overstact~~ 313

Kris Overstact